

# **EXHIBIT 4**

**EXHIBIT 4**

Transcript of  
**Christopher Michael Coulter**

Date: Monday, February 27, 2017

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LAWRENCE JUSTIN MILLS vs ANNE ARUNDEL COUNTY, MARYLAND  
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Pages 26-29

<p style="text-align: right;">Page 26</p> <p>1 anything like that?</p> <p>2 A That is correct.</p> <p>3 Q So you could ask him to leave at any</p> <p>4 time for any or no reason?</p> <p>5 A Yes.</p> <p>6 Q Okay. And at that point, what do you</p> <p>7 understand his obligation to be when you ask him to</p> <p>8 leave?</p> <p>9 MS. BEALL: Objection.</p> <p>10 A Can you restate that one time?</p> <p>11 Q Okay. When you asked Mr. Mills to</p> <p>12 leave, what is his obligation to Maryland Live?</p> <p>13 A If I was to ask him to leave, I would</p> <p>14 expect --</p> <p>15 MR. CREECH: Objection. Go ahead.</p> <p>16 MS. BEALL: Objection.</p> <p>17 A I would expect him to leave.</p> <p>18 Q Okay. And do you understand that that</p> <p>19 is also enforceable?</p> <p>20 A Yes.</p> <p>21 Q And that would be through either a</p>	<p style="text-align: right;">Page 28</p> <p>1 (Mr. Mills enters the room.)</p> <p>2 Q Got to find it first.</p> <p>3 (Discussion held off the record.)</p> <p>4 Q Feel free to review it and refresh your</p> <p>5 recollection. That would be correct, is that your</p> <p>6 initial report -- or is that your report?</p> <p>7 A This is my report.</p> <p>8 Q Okay.</p> <p>9 (Exhibit Number 1 is marked.)</p> <p>10 Q Now, when did you first see Mr. Mills?</p> <p>11 A Coming -- going into the restroom and</p> <p>12 then coming back out.</p> <p>13 Q So you didn't watch him play at all?</p> <p>14 A No.</p> <p>15 Q Okay. And you didn't see him in the pit</p> <p>16 then?</p> <p>17 A No.</p> <p>18 Q That's what I call a very bad question.</p> <p>19 My problem. You didn't see him in the pit gets a</p> <p>20 "no"; that what's called a double negative, and we</p> <p>21 have no answer. So let me ask again.</p>
<p style="text-align: right;">Page 27</p> <p>1 citizen's arrest for trespass or summoning the</p> <p>2 police for a trespasser, correct?</p> <p>3 MR. CREECH: Objection.</p> <p>4 MS. BEALL: Objection.</p> <p>5 A Yes.</p> <p>6 Q Okay. So when you approached Mr.</p> <p>7 Mills -- strike that.</p> <p>8 You said you saw him the first time</p> <p>9 where?</p> <p>10 A At -- I believe it was at the pit, but</p> <p>11 without looking at the report again, I couldn't</p> <p>12 tell you.</p> <p>13 Q Or the video?</p> <p>14 A Or the video. Either one. Well, the</p> <p>15 video only shows --</p> <p>16 Q Well, here's the report. You want your</p> <p>17 report or the incident file --</p> <p>18 A My report.</p> <p>19 Q -- report?</p> <p>20 Okay. Go ahead and use it to refresh</p> <p>21 your recollection.</p>	<p style="text-align: right;">Page 29</p> <p>1 Did you see him in the pit?</p> <p>2 A No.</p> <p>3 Q Okay. So it's safe to say that up to</p> <p>4 this point you and Mr. Mills are strangers?</p> <p>5 A That is correct.</p> <p>6 Q Do you know who Jason Yeager is?</p> <p>7 A No.</p> <p>8 Q Now, let's go to exactly what</p> <p>9 surveillance asked you to do. They asked you to</p> <p>10 eject Mr. Mills?</p> <p>11 A Evict.</p> <p>12 Q Evict. Okay. What does evict Mr. Mills</p> <p>13 mean?</p> <p>14 A It means that the casino no longer wants</p> <p>15 him on the property and they don't want him on the</p> <p>16 property for a set amount of time. That is</p> <p>17 determined by a minimum of 30 days. And then the</p> <p>18 board meets, and they decide how much longer that's</p> <p>19 going to be.</p> <p>20 Q Okay. And you can do that verbally,</p> <p>21 right?</p>

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Pages 30-33

<p style="text-align: right;">Page 30</p> <p>1 MS. BEALL: Objection.</p> <p>2 A No. They ask us to do that in writing.</p> <p>3 Q They ask you to try to do it in writing.</p> <p>4 Is that a more correct statement?</p> <p>5 MR. CREECH: Objection.</p> <p>6 MS. BEALL: Objection.</p> <p>7 A No, they want us to do it in writing.</p> <p>8 Q Okay. So they require that you get this</p> <p>9 procedure done in writing.</p> <p>10 A Yeah. We read the form and have them</p> <p>11 sign it as acknowledgment.</p> <p>12 Q What if they refuse to sign?</p> <p>13 A Then I put down it's refused to sign,</p> <p>14 and we send the individual on his way.</p> <p>15 Q What if they refuse to even let you know</p> <p>16 who they are?</p> <p>17 A Then we try to find out who they are by</p> <p>18 asking them to provide their ID.</p> <p>19 Q Do you take them into custody to ask</p> <p>20 them for ID?</p> <p>21 MS. BEALL: Objection.</p>	<p style="text-align: right;">Page 32</p> <p>1 MR. NERSESIAN: Could you read it back,</p> <p>2 please?</p> <p>3 (The question is read by the reporter.)</p> <p>4 Q Long pause.</p> <p>5 A Yes.</p> <p>6 Q Okay. Mr. Mills was in custody in that</p> <p>7 hallway, would you agree?</p> <p>8 A No.</p> <p>9 MS. BEALL: Objection.</p> <p>10 Q What part of the last question was</p> <p>11 missing?</p> <p>12 MR. CREECH: Objection.</p> <p>13 MS. BEALL: Objection.</p> <p>14 Q He was surrounded with a show of force,</p> <p>15 correct?</p> <p>16 MR. CREECH: Objection.</p> <p>17 MS. BEALL: Objection.</p> <p>18 Q Refer back to the video you've watched</p> <p>19 numerous times.</p> <p>20 A Right. Was it a show of force? No.</p> <p>21 Q Oh, so three security guards, one of</p>
<p style="text-align: right;">Page 31</p> <p>1 A We don't take them into custody. We</p> <p>2 take them back into the holding room.</p> <p>3 Q Do you know what -- you're a police --</p> <p>4 you were a police officer for years. Do you know</p> <p>5 what custody is?</p> <p>6 MR. CREECH: Objection.</p> <p>7 MS. BEALL: Objection.</p> <p>8 A I do.</p> <p>9 Q Okay. If somebody is told you can't</p> <p>10 leave, would you -- by people in authority with</p> <p>11 guns, would you agree that they are in custody?</p> <p>12 MR. CREECH: Objection.</p> <p>13 MS. BEALL: Objection.</p> <p>14 A With guns. Yes.</p> <p>15 Q Okay. What if they are surrounded by a</p> <p>16 show of force with hands on and directed to a</p> <p>17 certain place against their will, would you agree</p> <p>18 that they are in custody?</p> <p>19 MR. CREECH: Objection.</p> <p>20 MS. BEALL: Objection.</p> <p>21 A One more time with the question.</p>	<p style="text-align: right;">Page 33</p> <p>1 them reaching out at him -- three security</p> <p>2 personnel, one of them reaching out at him, is not</p> <p>3 a show of force in your opinion?</p> <p>4 MR. CREECH: Objection.</p> <p>5 MS. BEALL: Objection.</p> <p>6 A No.</p> <p>7 Q Okay. I did the double negative again,</p> <p>8 so let me re-ask the question.</p> <p>9 Are three people surrounding Mr. Mills</p> <p>10 with one reaching out towards him a show of force</p> <p>11 in your opinion?</p> <p>12 MR. CREECH: Objection.</p> <p>13 MS. BEALL: Objection.</p> <p>14 A No.</p> <p>15 Q Okay. You went hands-on with Mr. Mills;</p> <p>16 fair statement?</p> <p>17 MR. CREECH: Object.</p> <p>18 MS. BEALL: Objection.</p> <p>19 A I'm sorry?</p> <p>20 Q You went hands-on with Mr. Mills, fair</p> <p>21 statement?</p>



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Pages 34-37

<p style="text-align: right;">Page 34</p> <p>1 MR. CREECH: Objection.</p> <p>2 MS. BEALL: Objection.</p> <p>3 A No, I was trying to guide Mr. Mills to</p> <p>4 the holding area.</p> <p>5 <b>Q You didn't grab his wrist?</b></p> <p>6 A I grabbed his wrist, but I was trying to</p> <p>7 guide him to the holding area.</p> <p>8 <b>Q You grabbed his wrist. Again, in your</b></p> <p>9 <b>opinion, that is not a show of force?</b></p> <p>10 MR. CREECH: Objection.</p> <p>11 MS. BEALL: Objection.</p> <p>12 A No.</p> <p>13 <b>Q What did you have to do, shoot him</b></p> <p>14 <b>through the head?</b></p> <p>15 MR. CREECH: Objection.</p> <p>16 MS. BEALL: Objection. Don't answer</p> <p>17 that question.</p> <p>18 <b>Q No, I want you to answer the question</b></p> <p>19 <b>this way, then: At what point between grabbing</b></p> <p>20 <b>someone by the wrist and doing other things does it</b></p> <p>21 <b>become a show of force?</b></p>	<p style="text-align: right;">Page 36</p> <p>1 <b>officers for the very purpose of avoiding physical</b></p> <p>2 <b>confrontation or physical contact in a situation</b></p> <p>3 <b>involving somebody confronted by you; fair</b></p> <p>4 <b>statement?</b></p> <p>5 MR. CREECH: Objection.</p> <p>6 MS. BEALL: Objection.</p> <p>7 A It's a thing that we're taught to</p> <p>8 de-escalate the situations.</p> <p>9 <b>Q To de-escalate? I thought it was</b></p> <p>10 <b>something that was taught -- okay, yeah. It can</b></p> <p>11 <b>de-escalate, but it can also gain compliance. Is</b></p> <p>12 <b>that also part of it?</b></p> <p>13 MR. CREECH: Objection.</p> <p>14 MS. BEALL: Objection.</p> <p>15 <b>Q Okay. With respect to the verbal judo,</b></p> <p>16 <b>if you had to grab Mr. Mills -- if you felt or</b></p> <p>17 <b>reached a point where you grabbed Mr. Mills' wrist,</b></p> <p>18 <b>your verbal judo failed; is that a fair statement.</b></p> <p>19 MR. CREECH: Objection.</p> <p>20 MS. BEALL: Objection.</p> <p>21 A That's correct.</p>
<p style="text-align: right;">Page 35</p> <p>1 MS. BEALL: Objection.</p> <p>2 MR. CREECH: Objection.</p> <p>3 <b>Q That doesn't mean you don't answer.</b></p> <p>4 A I get that.</p> <p>5 I still do not believe it was a show of</p> <p>6 force.</p> <p>7 <b>Q Well, then answer the question. What,</b></p> <p>8 <b>beyond grabbing somebody by the wrist, is required</b></p> <p>9 <b>before it becomes a show of force?</b></p> <p>10 MR. CREECH: Objection.</p> <p>11 MS. BEALL: Objection.</p> <p>12 A I would say when we have to wrestle</p> <p>13 someone to the ground and handcuff them.</p> <p>14 <b>Q Ah, okay. You said you were trained in</b></p> <p>15 <b>verbal judo?</b></p> <p>16 A Mm-hmm.</p> <p>17 <b>Q Is that a yes?</b></p> <p>18 A Yes. Sorry. I had a drink of water.</p> <p>19 Yes, it is. I apologize.</p> <p>20 <b>Q And verbal judo is a course or process</b></p> <p>21 <b>often taught to police officers and security</b></p>	<p style="text-align: right;">Page 37</p> <p>1 <b>Q Why did it fail?</b></p> <p>2 MR. CREECH: Objection.</p> <p>3 MS. BEALL: Objection.</p> <p>4 A Mr. Mills didn't want to go with us to</p> <p>5 the room, so, at that point, it failed.</p> <p>6 <b>Q You could not gain compliance with</b></p> <p>7 <b>verbal judo of Mr. Mills; is that the same thing?</b></p> <p>8 A Yes.</p> <p>9 <b>Q Do you think he had to go to that room</b></p> <p>10 <b>with you?</b></p> <p>11 MS. BEALL: Objection.</p> <p>12 MR. CREECH: Objection.</p> <p>13 A We -- that's how we were instructed.</p> <p>14 <b>Q Who instructed you to do that?</b></p> <p>15 A That is the policy at the time at the</p> <p>16 casino.</p> <p>17 <b>Q Tell me what that policy says.</b></p> <p>18 A The policy says if we were evicting</p> <p>19 people, we were to take them back into the holding</p> <p>20 hallway, holding room area, and read them the</p> <p>21 eviction letter so that we don't embarrass them in</p>



<p style="text-align: right;">Page 38</p> <p>1 front of the floor.</p> <p>2 <b>Q Was there nothing in the policy about</b></p> <p>3 <b>refusal or resistance or stating "I don't want to</b></p> <p>4 <b>go back there"?</b></p> <p>5 A Not to my recollection.</p> <p>6 <b>Q So regardless of the customer's intent</b></p> <p>7 <b>or desires, it was the policy of Maryland Live that</b></p> <p>8 <b>people being evicted would be taken to that</b></p> <p>9 <b>hallway?</b></p> <p>10 A That is correct.</p> <p>11 MS. BEALL: Objection.</p> <p>12 <b>Q You said you raised three kids?</b></p> <p>13 A I did.</p> <p>14 <b>Q Okay. Did you ever use the word</b></p> <p>15 <b>"stranger danger" with them?</b></p> <p>16 MS. BEALL: Objection.</p> <p>17 MR. CREECH: Objection.</p> <p>18 A Yes.</p> <p>19 <b>Q And that's because strangers are people</b></p> <p>20 <b>they're supposed to avoid, right?</b></p> <p>21 A That is correct.</p>	<p style="text-align: right;">Page 40</p> <p>1 <b>he supposed to do anything you're telling him to</b></p> <p>2 <b>do?</b></p> <p>3 MS. BEALL: Objection.</p> <p>4 MR. CREECH: Objection.</p> <p>5 <b>Q In fact, by your own training of your</b></p> <p>6 <b>own children and your current expectations today,</b></p> <p>7 <b>Mr. Mills should not have accompanied you; fair</b></p> <p>8 <b>statement?</b></p> <p>9 MS. BEALL: Objection.</p> <p>10 MR. CREECH: Objection.</p> <p>11 A No.</p> <p>12 <b>Q Why not?</b></p> <p>13 A Mr. Mills -- I identified myself to Mr.</p> <p>14 Mills and who I was.</p> <p>15 <b>Q Why should he believe you?</b></p> <p>16 MS. BEALL: Objection.</p> <p>17 MR. CREECH: Objection.</p> <p>18 <b>Q Strangers lie, don't they?</b></p> <p>19 MR. CREECH: Objection.</p> <p>20 A They do, but they also don't carry</p> <p>21 Maryland Lottery badges on them.</p>
<p style="text-align: right;">Page 39</p> <p>1 MS. BEALL: Objection.</p> <p>2 <b>Q Also, did you ever give your children</b></p> <p>3 <b>instructions about what they should do or what the</b></p> <p>4 <b>proper course is if a stranger tries to touch you?</b></p> <p>5 MS. BEALL: Objection.</p> <p>6 A Yes.</p> <p>7 <b>Q And what was the instructions that you</b></p> <p>8 <b>gave?</b></p> <p>9 MS. BEALL: Objection.</p> <p>10 A If someone was trying to approach them</p> <p>11 or someone tried to get them, to scream, yell, try</p> <p>12 to get someone's attention, try to get help.</p> <p>13 <b>Q Mr. Mills ever say "help"?</b></p> <p>14 A Not that I remember.</p> <p>15 <b>Q And nothing's changed now that your kids</b></p> <p>16 <b>are adults, you would expect them to still have the</b></p> <p>17 <b>same type of reaction overall, right?</b></p> <p>18 MS. BEALL: Objection.</p> <p>19 A I would hope they would.</p> <p>20 <b>Q Yeah. Let's go back to what I asked a</b></p> <p>21 <b>few minutes ago. You guys are strangers. Why is</b></p>	<p style="text-align: right;">Page 41</p> <p>1 <b>Q Did you show him your badge?</b></p> <p>2 A It's on me; it was in plain sight.</p> <p>3 <b>Q Okay. Want to see my pretty little</b></p> <p>4 <b>silver badge that says I'm a lone ranger? People</b></p> <p>5 <b>can have badges, right? Okay. True?</b></p> <p>6 MS. BEALL: Objection.</p> <p>7 A It's true.</p> <p>8 <b>Q Yeah. You ought to start carrying a</b></p> <p>9 <b>lone ranger badge. All right.</b></p> <p>10 <b>What good can come out of him following</b></p> <p>11 <b>you?</b></p> <p>12 MS. BEALL: Objection.</p> <p>13 A Just so he doesn't get embarrassed on</p> <p>14 the floor, after reading him all that there.</p> <p>15 Eviction letter, excuse me.</p> <p>16 <b>Q I think it was in yours that -- what is</b></p> <p>17 <b>stop one or -- wait a minute.</b></p> <p>18 A I have no idea.</p> <p>19 <b>Q Can -- may I, for a second?</b></p> <p>20 A Yeah, yeah.</p> <p>21 <b>Q Post one?</b></p>



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<p style="text-align: right;">Page 42</p> <p>1 A Post one.</p> <p>2 Q Okay.</p> <p>3 A Post one? I don't know of any post one.</p> <p>4 I know post 10.</p> <p>5 Q Well, you're the guy who actually sat at</p> <p>6 a keyboard and entered the information on Coulter</p> <p>7 1, correct?</p> <p>8 A I don't recall what post one is. I</p> <p>9 mean, I really don't.</p> <p>10 Q Okay. What about the other question?</p> <p>11 A What?</p> <p>12 Q You're the one who sat at a keyboard --</p> <p>13 MR. CREECH: Objection. What other --</p> <p>14 Q That other question. You're the one at</p> <p>15 the keyboard who actually put in the information</p> <p>16 that ended up on Coulter 1?</p> <p>17 A That is correct.</p> <p>18 Q Do you recall Mr. Mills attempting to</p> <p>19 continue walking away from you when one of your</p> <p>20 agents or one of the -- another Maryland Live</p> <p>21 employee put out his arm and stopped him?</p>	<p style="text-align: right;">Page 44</p> <p>1 Q After.</p> <p>2 A I was interviewed after, when the first</p> <p>3 charges came for the -- I forget what it is. But,</p> <p>4 yeah, the first time. That was the only time I've</p> <p>5 ever talked to anyone.</p> <p>6 Q Right.</p> <p>7 A But never the police.</p> <p>8 Q Who was that?</p> <p>9 A It was my attorney.</p> <p>10 Q Your attorney related to this</p> <p>11 litigation?</p> <p>12 A Yeah, the first one, the first time,</p> <p>13 when the charges were filed with Anne Arundel</p> <p>14 County. I couldn't tell you.</p> <p>15 Q Okay. Were you still working at</p> <p>16 Maryland Live at that point?</p> <p>17 A Yes.</p> <p>18 Q At that point in time, had the policies</p> <p>19 at Maryland Live changed?</p> <p>20 MS. BEALL: Objection.</p> <p>21 MR. CREECH: Objection.</p>
<p style="text-align: right;">Page 43</p> <p>1 A Do I remember that?</p> <p>2 Q Yes.</p> <p>3 A Yes.</p> <p>4 Q And that did happen?</p> <p>5 A Yes.</p> <p>6 Q Why couldn't Mr. Mills go where he</p> <p>7 wanted to?</p> <p>8 A We were following the procedure at the</p> <p>9 time, which is we had -- we needed to take him to</p> <p>10 the back room.</p> <p>11 Q Is that the procedure today?</p> <p>12 MS. BEALL: Objection.</p> <p>13 A I have no idea. It's changed in two and</p> <p>14 a half years.</p> <p>15 Q All right. Was that the procedure --</p> <p>16 strike that.</p> <p>17 Did you have any questions posed to you</p> <p>18 at any time by Anne Arundel police or the district</p> <p>19 attorney about this incident? Were you ever</p> <p>20 interviewed?</p> <p>21 A Before or after?</p>	<p style="text-align: right;">Page 45</p> <p>1 A I don't remember if they have or not.</p> <p>2 Q Okay. Do you know if the policies at</p> <p>3 Maryland -- at any time while you were working</p> <p>4 there, did the policies at Maryland Live say unless</p> <p>5 there is a crime committed, nobody is to be taken</p> <p>6 to the back room?</p> <p>7 A I -- I couldn't tell you.</p> <p>8 Q What do you remember about changing</p> <p>9 policy while you were there relative to persons in</p> <p>10 Mr. Mills' situation?</p> <p>11 A As such?</p> <p>12 Q Do you recall -- do you recall what --</p> <p>13 strike that.</p> <p>14 You testified as to your policy at the</p> <p>15 time of this -- as of February 20th, 2014, right?</p> <p>16 MS. BEALL: Objection.</p> <p>17 A Yes.</p> <p>18 Q And that is the policy regarding</p> <p>19 eviction?</p> <p>20 A Correct.</p> <p>21 Q And that policy regarding eviction is</p>



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Pages 46-49

<p style="text-align: right;">Page 46</p> <p>1 they are taken to the back room?</p> <p>2 A That is correct.</p> <p>3 Q At any time while you were with Maryland</p> <p>4 Live did that policy change?</p> <p>5 A I have no idea.</p> <p>6 Q No recollection or no idea?</p> <p>7 A No recollection.</p> <p>8 Q Okay. You would have to have an idea;</p> <p>9 you were the guy enforcing the policy, right?</p> <p>10 A Yes.</p> <p>11 MS. BEALL: Objection.</p> <p>12 MR. CREECH: Objection.</p> <p>13 Q Did you ever become familiar with that</p> <p>14 policy changing at any time?</p> <p>15 A At some point it did change.</p> <p>16 Q To what?</p> <p>17 A To where if we wanted to, we could go to</p> <p>18 post 10, or on the spot read, as long as it wasn't</p> <p>19 anything overly serious that required us to remove</p> <p>20 someone from the floor, fights, things like that.</p> <p>21 Q Breaches of the peace?</p>	<p style="text-align: right;">Page 48</p> <p>1 A It would have been in the SOP, standard</p> <p>2 operating procedures, if that's what they're</p> <p>3 called.</p> <p>4 Q Were those written?</p> <p>5 A Yes.</p> <p>6 Q So somewhere there's a written policy</p> <p>7 that says anybody who is to be evicted is to be</p> <p>8 taken into the back hallway?</p> <p>9 A At that time there should have been,</p> <p>10 yes.</p> <p>11 Q Okay. In your training to be an MP, did</p> <p>12 you study false imprisonment?</p> <p>13 A Yes.</p> <p>14 Q Okay. Now, you understand Maryland Live</p> <p>15 is a private entity, correct?</p> <p>16 A That is correct.</p> <p>17 Q They don't make laws?</p> <p>18 A That is correct.</p> <p>19 Q Okay. What is your understanding of</p> <p>20 what constitutes false imprisonment?</p> <p>21 A Being confined to a cell against their</p>
<p style="text-align: right;">Page 47</p> <p>1 A Yes.</p> <p>2 Q Okay. So at that point, it was read</p> <p>3 them at the floor, right, or on the floor?</p> <p>4 A After the incident?</p> <p>5 Q Yeah. I'm talking about the changed</p> <p>6 policy.</p> <p>7 A Oh, yes.</p> <p>8 Q That's the point I'm referring to.</p> <p>9 A Yes, at that point it did change.</p> <p>10 Q Okay. Were you in any way instrumental</p> <p>11 in seeing that policy changed? Were you involved</p> <p>12 in seeing that policy changed?</p> <p>13 A No, I didn't make policy there for the</p> <p>14 security department.</p> <p>15 Q Do you know if that change came in</p> <p>16 response to Mr. Mills' original charges or anything</p> <p>17 to do with the Mills occurrence?</p> <p>18 A I have no idea.</p> <p>19 MS. BEALL: Objection.</p> <p>20 MR. CREECH: Objection.</p> <p>21 Q Where would one have found that policy?</p>	<p style="text-align: right;">Page 49</p> <p>1 will.</p> <p>2 Q It has to be a cell or just confined or</p> <p>3 taken into custody against their will?</p> <p>4 A Confined to a room, an area.</p> <p>5 Q Okay. Against their will, right?</p> <p>6 A Yes.</p> <p>7 Q And without consent, Mr. Mills did not</p> <p>8 consent to go to that back room. Is that a fair</p> <p>9 statement?</p> <p>10 MS. BEALL: Objection.</p> <p>11 A Yes.</p> <p>12 Q In fact, he protested, true?</p> <p>13 A Yes.</p> <p>14 Q As you understood it, what was the legal</p> <p>15 authority for Maryland Live to make somebody go to</p> <p>16 their back room --</p> <p>17 MS. BEALL: Objection.</p> <p>18 Q -- for an eviction? Under what legal</p> <p>19 authority could they take them there?</p> <p>20 MS. BEALL: Objection.</p> <p>21 MR. CREECH: Objection.</p>



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Pages 50-53

<p style="text-align: right;">Page 50</p> <p>1 Q If you know?</p> <p>2 A I don't know.</p> <p>3 Q So did you -- do you recognize that</p> <p>4 there has to be legal authority to take someone</p> <p>5 into custody, else it is false imprisonment?</p> <p>6 MS. BEALL: Objection.</p> <p>7 Q Absent legal authority, taking someone</p> <p>8 into custody is false imprisonment; would that be</p> <p>9 your understanding?</p> <p>10 MS. BEALL: Objection.</p> <p>11 A Yes.</p> <p>12 Q Okay. While you were doing this to Mr.</p> <p>13 Mills, did you ever once question whether or not</p> <p>14 you were -- what you were doing was legal?</p> <p>15 A No.</p> <p>16 MS. BEALL: Objection.</p> <p>17 Q Have you since?</p> <p>18 A No.</p> <p>19 MS. BEALL: Objection.</p> <p>20 MR. CREECH: Objection.</p> <p>21 Q So today, with the same instructions</p>	<p style="text-align: right;">Page 52</p> <p>1 A If the -- this is going back. I can't</p> <p>2 give you a good read without the UCMJ sitting in</p> <p>3 front of me.</p> <p>4 Q It was a real tough one even then,</p> <p>5 wasn't it?</p> <p>6 A It was. But, God, it was so long ago.</p> <p>7 Q Don't you actually -- isn't the rule in</p> <p>8 the military that you have to look at it, and it</p> <p>9 falls on the individual who gets the order, and if</p> <p>10 it truly is an unlawful order, they are supposed to</p> <p>11 refuse to follow it and take the consequences and</p> <p>12 stand on their understanding of the law?</p> <p>13 MS. BEALL: Objection.</p> <p>14 A That's pretty much close to it, yes.</p> <p>15 Q Yeah, okay. Would you have more or less</p> <p>16 authority to refuse an unlawful order of a private</p> <p>17 employer or the military?</p> <p>18 MS. BEALL: Objection.</p> <p>19 MR. CREECH: Objection.</p> <p>20 Q It's easier to say no to a private</p> <p>21 employer than it is to a colonel, isn't it?</p>
<p style="text-align: right;">Page 51</p> <p>1 from an employer that were a standard operating</p> <p>2 procedure as to an eviction, if it read the</p> <p>3 identical way it does today, you would do exactly</p> <p>4 what you did here?</p> <p>5 A That is correct.</p> <p>6 MS. BEALL: Objection.</p> <p>7 Q What if it was -- strike that.</p> <p>8 Did you learn at some point a</p> <p>9 surreptitious police move known as an angle drop?</p> <p>10 MS. BEALL: Objection.</p> <p>11 MR. CREECH: Objection.</p> <p>12 A I've never heard of that.</p> <p>13 Q Where, if somebody's resisting and you</p> <p>14 happen to fall on them the correct way, you can be</p> <p>15 guaranteed to break their ankle?</p> <p>16 A No.</p> <p>17 Q Oh, okay.</p> <p>18 MR. CREECH: Objection.</p> <p>19 Q Please don't learn it.</p> <p>20 When you were in the military, what was</p> <p>21 the rule regarding unlawful orders?</p>	<p style="text-align: right;">Page 53</p> <p>1 MS. BEALL: Objection.</p> <p>2 MR. CREECH: Objection.</p> <p>3 A No, not really.</p> <p>4 Q No? One subjects you to the brig, the</p> <p>5 other subjects you to getting another -- a</p> <p>6 different job. You don't think that one is more</p> <p>7 onerous than the other?</p> <p>8 MS. BEALL: Objection.</p> <p>9 MR. CREECH: Objection.</p> <p>10 A No.</p> <p>11 Q Oh, okay. Did I use the right term for</p> <p>12 the Air Force, brig?</p> <p>13 A I knew what you were talking about, so</p> <p>14 yes, that was fine.</p> <p>15 Q Okay. Since we came in here, I have --</p> <p>16 can we go off?</p> <p>17 (Discussion held off the record.)</p> <p>18 (A recess is taken.)</p> <p>19 BY MR. NERSESIAN:</p> <p>20 Q This policy that's written down</p> <p>21 somewhere that everybody has to go through the back</p>



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Pages 54-57

<p style="text-align: right;">Page 54</p> <p>1 hallway, what else is part of that policy?</p> <p>2 MS. BEALL: Objection.</p> <p>3 A Without sitting in front of me, I</p> <p>4 couldn't tell you. I mean, I could tell you some</p> <p>5 basic things. Checking IDs --</p> <p>6 Q And what would happen if somebody</p> <p>7 refused to provide ID?</p> <p>8 MR. CREECH: Objection.</p> <p>9 MS. BEALL: Objection.</p> <p>10 A Well, it would depend upon what</p> <p>11 situation we're talking about. If they're trying</p> <p>12 to come through the entrance and they don't want to</p> <p>13 provide us their ID, then they're turned away.</p> <p>14 Q Right.</p> <p>15 A If they're asked for ID on the floor</p> <p>16 because someone thinks they're too young or they're</p> <p>17 not sure what their status is, then we'll ask</p> <p>18 people to produce IDs on the floor.</p> <p>19 Q And if they don't, you'll ask them to</p> <p>20 leave, right?</p> <p>21 A Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 way. The court reporter to your left looks at you</p> <p>2 and says, let me see your driver's license, do you</p> <p>3 have to give it to her?</p> <p>4 MS. BEALL: Objection.</p> <p>5 MR. CREECH: Objection.</p> <p>6 A We're not in a casino, so no.</p> <p>7 Q Why in a casino?</p> <p>8 A Because there are age restrictions --</p> <p>9 Q You weren't checking his age, were you?</p> <p>10 MS. BEALL: Objection.</p> <p>11 MR. CREECH: Objection.</p> <p>12 A No.</p> <p>13 Q Okay. Why does -- why would he have to</p> <p>14 give you his ID?</p> <p>15 A It's part of the process we -- we have</p> <p>16 to get an address from him.</p> <p>17 Q And if you already have an address, it</p> <p>18 wouldn't matter, would it?</p> <p>19 MS. BEALL: Objection.</p> <p>20 A We'd still have to verify it.</p> <p>21 Q Why?</p>
<p style="text-align: right;">Page 55</p> <p>1 Q What's different about Mr. Mills?</p> <p>2 A Mr. Mills was being served --</p> <p>3 MS. BEALL: Objection.</p> <p>4 A -- an eviction letter. Sorry.</p> <p>5 Q What do you need to serve an eviction</p> <p>6 letter?</p> <p>7 A I need an ID so we can put down the</p> <p>8 right address, make sure that his certified letter</p> <p>9 that he gets sent saying what the final status is,</p> <p>10 he gets.</p> <p>11 Q That's for the casino's convenience,</p> <p>12 right?</p> <p>13 MS. BEALL: Objection.</p> <p>14 MR. CREECH: Objection.</p> <p>15 A I would assume so, but I can't tell you</p> <p>16 for sure.</p> <p>17 Q So, do you think you can compel somebody</p> <p>18 to produce identification under the law?</p> <p>19 MS. BEALL: Objection.</p> <p>20 MR. CREECH: Objection.</p> <p>21 Q Do you think that? Think about it this</p>	<p style="text-align: right;">Page 57</p> <p>1 A Because I don't know that we had an</p> <p>2 address for him.</p> <p>3 Q Did you ask him, have we got your</p> <p>4 address?</p> <p>5 A Not that I remember, no.</p> <p>6 Q No. Instead, you called two cops in to</p> <p>7 loom over him and get his driver's license, right?</p> <p>8 MR. CREECH: Objection.</p> <p>9 MS. BEALL: Objection.</p> <p>10 A I asked two officers to help me, yes.</p> <p>11 Q Okay. For the sole purpose of getting</p> <p>12 his identification?</p> <p>13 A That is correct.</p> <p>14 Q Okay. So let's go back to this call</p> <p>15 down from surveillance. They used -- they called</p> <p>16 him by name, right?</p> <p>17 A No.</p> <p>18 Q No?</p> <p>19 A My call was there was a advantage player</p> <p>20 at pit seven, which I believe I think is the high</p> <p>21 limits, but I can't say for sure, it's been so</p>



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Pages 58-61

<p style="text-align: right;">Page 58</p> <p>1 long. And they just gave me a basic description. 2 They told me that he just -- we saw him go in the 3 bathroom and we came out. 4 <b>Q Actually, you followed him into the</b> 5 <b>bathroom, didn't you?</b> 6 A Right. They gave me kind of a 7 description of him, and I assumed that was him. 8 And when he came out, they told me. 9 <b>Q So you had a radio on?</b> 10 A (Nods head.) 11 MS. BEALL: Make sure you respond 12 verbally. 13 A Oh, yes, I had a radio on. 14 <b>Q Was this a wire --</b> 15 A It's an earpiece. 16 <b>Q And surveillance can hear what you're</b> 17 <b>saying, too, right?</b> 18 A I don't know what their capabilities of. 19 I've never been in the surveillance room. They 20 have -- our radios have several different 21 frequencies, and each service has their own</p>	<p style="text-align: right;">Page 60</p> <p>1 A Yeah, we just call it the hallway. We 2 called it MSLA hallway. 3 <b>Q Could it be Maryland Live Gaming</b> 4 <b>Commission Access Hallway? And if the gaming</b> 5 <b>commission comes on site, that's where they want to</b> 6 <b>talk to people?</b> 7 MR. CREECH: Objection. 8 MS. BEALL: Objection. 9 A Maryland Live Lottery, our gaming 10 commission has an office in the casino itself, in 11 that hallway. 12 <b>Q In that hallway?</b> 13 A Right. At the end of the hallway. 14 <b>Q So that hallway takes you to the</b> 15 <b>commission?</b> 16 A That is right, and to the doctor too. 17 <b>Q Is there also a security holding room?</b> 18 A There is one. 19 <b>Q Now, you've taken Mr. Mills back there</b> 20 <b>to interrogate him about his identification; fair</b> 21 <b>statement?</b></p>
<p style="text-align: right;">Page 59</p> <p>1 frequency that they transmit on. But I don't know 2 if surveillance has the capability to monitor it or 3 not. 4 <b>Q Is yours constant on or do you have to</b> 5 <b>push a button?</b> 6 A Mine is always on. 7 <b>Q Okay.</b> 8 A To listen, to transmit, I need to push a 9 button. 10 <b>Q Well, this is the full incident file</b> 11 <b>report.</b> 12 A That's surveillance's only. 13 <b>Q Oh, it's not --</b> 14 A This is -- that's this one here. 15 <b>Q That's yours, this is surveillance's.</b> 16 <b>Well, surveillance says -- let me --</b> 17 <b>hold on a second. MLGCA hallway. Do you know what</b> 18 <b>MLGCA stands for?</b> 19 A Maryland Lottery Gaming Commission, I 20 can't tell you anything else. 21 <b>Q Accessway?</b></p>	<p style="text-align: right;">Page 61</p> <p>1 MS. BEALL: Objection. 2 MR. CREECH: Objection. 3 A I was asking him for his ID, yes. 4 <b>Q And he was refusing to provide it?</b> 5 A Yes. 6 <b>Q Okay. Could you have taken him to the</b> 7 <b>other holding room to do that?</b> 8 MR. CREECH: Objection. 9 MS. BEALL: Objection. 10 A You're talking about the small holding 11 room? 12 <b>Q Where else would you take somebody to --</b> 13 <b>for investigation or interviewing?</b> 14 A It would be in that hallway or in the 15 confinement room. I don't want to use confinement. 16 The holding room. 17 <b>Q Yes. Okay. What is it called, the</b> 18 <b>confinement room or the holding room?</b> 19 A It's the holding room. 20 <b>Q Is there audio in the holding room?</b> 21 A Yes, there is.</p>



LAWRENCE JUSTIN MILLS vs ANNE ARUNDEL COUNTY, MARYLAND  
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Pages 118-121

<p style="text-align: right;">Page 118</p> <p>1 Q Yes or no?</p> <p>2 A I'm sorry, yes.</p> <p>3 Q All right. And as you said, this was</p> <p>4 policy and protocol, so everything they were seeing</p> <p>5 was normal to them, too?</p> <p>6 A That is correct.</p> <p>7 MS. BEALL: Objection.</p> <p>8 MR. CREECH: Objection.</p> <p>9 Q Is there a security manager at Maryland</p> <p>10 Live Casino?</p> <p>11 A Well, there are three, one works days,</p> <p>12 swings, and mids.</p> <p>13 Q And you're one of the security managers?</p> <p>14 A That's right.</p> <p>15 Q Okay. Did everything you did that night</p> <p>16 related to the Mills occurrence occur within the</p> <p>17 course and scope of your employment with Maryland</p> <p>18 Live?</p> <p>19 MS. BEALL: Objection.</p> <p>20 A Yes.</p> <p>21 Q Did Mr. Mills touch you before you</p>	<p style="text-align: right;">Page 120</p> <p>1 added?</p> <p>2 MR. CREECH: Objection.</p> <p>3 MS. BEALL: Objection.</p> <p>4 A There seems to be a quiet spell in there</p> <p>5 where there doesn't seem to be any audio. But the</p> <p>6 rest of it seems to fairly portray what happened.</p> <p>7 Q Nobody's talking at the time when that's</p> <p>8 happening, is there?</p> <p>9 A I can't tell.</p> <p>10 Q Okay. Everything on there that you can</p> <p>11 hear said was said?</p> <p>12 A Yes.</p> <p>13 Q Okay. Did Mr. Mills raise his voice out</p> <p>14 on the floor?</p> <p>15 A I can't remember.</p> <p>16 Q So you have no recollection of Mr. Mills</p> <p>17 yelling at anybody?</p> <p>18 A I just can't remember.</p> <p>19 Q Okay. It looks like earlier this month</p> <p>20 you signed answers to interrogatories. Do you</p> <p>21 recall that?</p>
<p style="text-align: right;">Page 119</p> <p>1 grabbed him?</p> <p>2 A Not that I recall.</p> <p>3 Q Now, when you watched the YouTube video,</p> <p>4 did you see -- and I'm talking about the part where</p> <p>5 there is audio.</p> <p>6 A Oh, in the hallway?</p> <p>7 Q Yes.</p> <p>8 A Okay.</p> <p>9 Q On that video, did you see anything that</p> <p>10 varies with that which actually occurred or --</p> <p>11 MR. CREECH: Objection.</p> <p>12 Q -- varies from that which actually</p> <p>13 occurred?</p> <p>14 MR. CREECH: Objection to form.</p> <p>15 MS. BEALL: Objection.</p> <p>16 A No, nothing. Nothing was varied as far</p> <p>17 as I can see, remember.</p> <p>18 Q Okay. And as to what was said in that</p> <p>19 room while you were there, during that video that</p> <p>20 is on YouTube with the audio, did there appear to</p> <p>21 be any audio that was missing or any audio that was</p>	<p style="text-align: right;">Page 121</p> <p>1 A Yes. Earlier this month? Yeah.</p> <p>2 Q And has your memory deteriorated since</p> <p>3 then?</p> <p>4 MR. CREECH: Objection.</p> <p>5 A I --</p> <p>6 MS. BEALL: Objection.</p> <p>7 A I am old, so I don't know.</p> <p>8 Q You're not that old.</p> <p>9 A I'll be 56 this year, so.</p> <p>10 Q Thank you if you think that's old. No,</p> <p>11 curse you if you think that's old.</p> <p>12 Do you recall anything said between Mr.</p> <p>13 Isella and Mr. Mills --</p> <p>14 A No.</p> <p>15 Q -- on the floor? No?</p> <p>16 A No, I do not recall any -- I don't</p> <p>17 remember anything being said.</p> <p>18 Q All right. These are your answers to</p> <p>19 interrogatories. You've signed and sworn to these.</p> <p>20 And it says here: Defendant recalls plaintiff</p> <p>21 raising his voice to Mr. Isella at this time in a</p>



LAWRENCE JUSTIN MILLS vs ANNE ARUNDEL COUNTY, MARYLAND  
Transcript of Douglas Bilter taken February 24, 2017

Pages 142-145

<p style="text-align: right;">Page 142</p> <p>1 A. I have nothing further than discussions</p> <p>2 with counsel. I can't advise you of anything else.</p> <p>3 MR. NERSESIAN: Wow, you better go look up</p> <p>4 Champerties and maintenance.</p> <p>5 MR. CREECH: Wow, you better go --</p> <p>6 MR. NERSESIAN: Fine.</p> <p>7 Q. So you thought at the time Isella worked</p> <p>8 for the Commission, right?</p> <p>9 A. I assumed that, yes.</p> <p>10 Q. And you assumed you were being recorded?</p> <p>11 A. By video?</p> <p>12 MR. CREECH: Objection.</p> <p>13 Q. Yeah.</p> <p>14 A. Yes, I assumed that. Considering there is</p> <p>15 video almost everywhere in that casino.</p> <p>16 Q. And you're a police officer with the Anne</p> <p>17 Arundel courts -- or Anne Arundel County working as</p> <p>18 secondary employment as a security officer at</p> <p>19 Maryland Live?</p> <p>20 A. Correct.</p> <p>21 Q. And also present is Coulter, the security</p>	<p style="text-align: right;">Page 144</p> <p>1 A. Yes.</p> <p>2 Q. You watched it months ago too, didn't you?</p> <p>3 MR. CREECH: Objection. Asked and</p> <p>4 answered.</p> <p>5 A. I'm saying at the time of this incident I</p> <p>6 didn't know any of this.</p> <p>7 Q. And at the time of the incident he didn't</p> <p>8 know there wasn't audio recording going on as there</p> <p>9 normally is, did he?</p> <p>10 MR. CREECH: Objection.</p> <p>11 MS. BEALL: Objection.</p> <p>12 Q. Did he?</p> <p>13 A. You're asking --</p> <p>14 MR. CREECH: Objection as to normal.</p> <p>15 A. You're asking if I knew he --</p> <p>16 Q. Seeing as one, their security policy said</p> <p>17 it should be undertaken --</p> <p>18 MS. BEALL: Just so you know, the security</p> <p>19 policy is about a different -- it's a room, a</p> <p>20 holding room, it's not the hallway.</p> <p>21 MR. NERSESIAN: Yeah. Except do you know</p>
<p style="text-align: right;">Page 143</p> <p>1 manager at Maryland Live?</p> <p>2 A. Yes, I believe he's the security manager.</p> <p>3 Q. So as you understood it, while you were</p> <p>4 talking at Mr. Mills, there was a private</p> <p>5 individual, Mr. Mills, a Gaming Commission person,</p> <p>6 you, and a full-time employee of Maryland Live</p> <p>7 present. Did you think you were having a private</p> <p>8 conversation -- and it was all being filmed. Did</p> <p>9 you think you were having a private conversation</p> <p>10 with Mr. Mills?</p> <p>11 MR. CREECH: Objection.</p> <p>12 MS. BEALL: Objection.</p> <p>13 A. Of course I did. We were in a secured</p> <p>14 back hallway area, we weren't out on the public</p> <p>15 floor.</p> <p>16 Q. Yeah. And he was taken there, wasn't it?</p> <p>17 MR. CREECH: Objection.</p> <p>18 MS. BEALL: Objection.</p> <p>19 A. Again, I don't know how he got there</p> <p>20 except for when I got there.</p> <p>21 Q. No, you do, you saw the video?</p>	<p style="text-align: right;">Page 145</p> <p>1 what MGC -- MLGCA is. That's the name of your</p> <p>2 hallway, go look it up.</p> <p>3 MS. BEALL: I'm telling you -- well, you</p> <p>4 can ask. But that's what they will testify to.</p> <p>5 MR. NERSESIAN: Here's the other thing.</p> <p>6 There is a policy that says that he should --</p> <p>7 it should be audio recorded. It is normal when</p> <p>8 he's taken to a back room, all over the country</p> <p>9 and all the over the world that it is recorded.</p> <p>10 MR. CREECH: Can this be done outside the</p> <p>11 presence of the witness.</p> <p>12 MR. NERSESIAN: No, I'm talking to her for</p> <p>13 a moment.</p> <p>14 MR. CREECH: I understand. But I don't</p> <p>15 want it in front of the witness because you're</p> <p>16 asking him about the audio recording and saying</p> <p>17 that it should have been audio recorded, and</p> <p>18 he's already said he didn't know that.</p> <p>19 MR. NERSESIAN: I understand he didn't</p> <p>20 know that. But she's saying that that's the</p> <p>21 place.</p>

